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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

CHRIS LANGER,

Plaintiff,

v.

JEROME M. NAVARRA, in his  
individual and representative capacity  
as trustee of the Jerome Navarra Family  
Trust; MANOUCHER M.  
RAHNAMIE; and DOES 1-10,

Defendants.

Case No. 14-CV-1076-WQH-JMA

**JOINT MOTION TO EXTEND  
TIME FOR DEFENDANTS TO  
RESPOND TO COMPLAINT**

1 Plaintiff CHRIS LANGER (“Langer”) and Defendant JEROME NAVARRA  
 2 (“Navarra”) through their respective counsel of record, and Defendant  
 3 MANOUCHER RAHNAMEIE (“Rahnamie”) on his own behalf, hereby jointly move  
 4 for an order extending the time for Defendants to respond to Langer’s complaint.

5 On or about April 29, 2014, Langer filed his complaint in this action. On or  
 6 about May 4, 2014, Langer served the summons and complaint on Navarra. On or  
 7 about May 1, 2014, Langer served the summons and complaint on Rahnamie.  
 8 Pursuant to Federal Rules of Civil Procedure Rule 12, Navarra’s response to  
 9 Langer’s complaint would regularly be due on or before May 27, 2014, and  
 10 Rahnamie’s response to Langer’s complaint would regularly be due on or before  
 11 May 21, 2014. The parties have reached a verbal agreement on some but not all  
 12 terms to settle this action in its entirety and have agreed that Defendants shall have  
 13 additional time to respond to the complaint so that they may finalize the written  
 14 settlement agreement without the need to file and oppose any pleading challenges,  
 15 including but not limited to a motion to dismiss.

16 Accordingly, the parties hereby jointly move for an order providing that  
 17 Defendants shall have until June 6, 2014, to respond to Langer’s complaint if said  
 18 complaint is not dismissed prior to such time.

19  
 20 DATED: May 23, 2014

CENTER FOR DISABILITY ACCESS

21 By: /s/ Phyl Grace

22 Mark Potter

23 Phyl Grace

24 Dennis Price

25 Attorneys for Plaintiff Chris Langer  
 26  
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1 DATED: May 23, 2014

McKENNA LONG & ALDRIDGE LLP

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By: /s/ Tami Penner

3

Tami Penner

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Attorneys for Defendant Jerome M. Navarra

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7 DATED: May 23, 2014

By: M. Rahnamaie

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Manoucher M. Rahnamaie

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10 I, Tami J. Penner, hereby certify that the content of this joint motion is  
11 acceptable to all parties who are required to sign this joint motion, and Plaintiff's  
12 counsel authorized Defendant M. Navarra to affix her CM/ECF electronic signature  
13 to this joint motion.

13

14 DATED: May 23, 2014

McKENNA LONG & ALDRIDGE LLP

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By: /s/ Tami Penner

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Tami Penner

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Attorneys for Defendant Jerome M. Navarra

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